Exhibit A

Exhibit 10

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Public Interest Legal Foundation, *Plaintiff,* *v.* Kathy Boockvar, Secretary of the Commonwealth of Pennsylvania, in her official capacity. *Defendant.*	Civ. No. 20-_____

DECLARATION OF KENNETH J. BLOCK

I, Kenneth J. Block, being of full age, hereby certify:

1. I am the President of Simpatico Software Systems, Inc. ("Simpatico"), a duly registered corporation under the laws of the state of Rhode Island with a principal place of business located at: 20 Altieri Way, Unit 3, Warwick, Rhode Island, 02886.

2. I have been employed by Simpatico since 2001 and have been the President of the company during the entire course of my employment.

3. I have thirty-two years of experience working with large, mission-critical systems involving billions of data records and developing anti-fraud analytics. My resume is attached to this Declaration as Exhibit A.

4. The Public Interest Legal Foundation ("PILF") retained Simpatico to process files of state voter registration data and to determine

whether the state voter roll contained deceased registrants, and to then provide a list of those deceased registrants. Simpatico employs systems and controls to ensure the highest level of accuracy. The process utilized can be broken down into discrete steps as enumerated below.

5. PILF purchased a file from the Pennsylvania Secretary of State's offices containing current voter registration data and transmitted that file to Simpatico via a secure electronic mail system.

6. Simpatico processes the voter registration file, normalizing the data and storing the data in a database of our design, on our secure system. The data normalization process includes synchronizing data fields, such as making all data upper case, standardizing street names, standardizing nomenclatures for apartments, and addressing other nuances that must be accounted for when conducting comparisons.

7. Simpatico then securely exports specific pieces of the voter registration data necessary for death match processing to a commercial database processor.

8. The commercial database processor removes registrants that they determine to be alive, leaving a file of voters who might be deceased. The exact process involves searching for registrants in various publicly available databases that reflect recent commercial activity. The processor does no further analysis of potentially deceased registrants whose commercial footprint is recently active.

9. The list of possibly deceased registrants is then compared against regulated data files in order to identify the full Social Security numbers of each possibly deceased voter. This match is done in a 'tight' manner, with a match determined only if name, address, and birth date information are confirmed. Historical address data

and obituaries are also consulted to confirm identities. The actual Social Security numbers identified in this step never leave the secure servers of the commercial database processor.
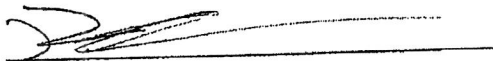
10. The Social Security number found in the step above is then used to search the Social Security Death Index (a database maintained by the Social Security Administration), as well as a credit bureau database to determine if the voter with that Social Security number has been reported as deceased. This step is an industry-wide standard that is used to determine whether an individual is officially considered to be deceased.

11. The commercial database processor securely transmits the processed files to Simpatico that identify registrants on the voter roll who have been determined to be deceased using the above methodology. These files do not contain Social Security numbers.

12. Simpatico imports the file into its database for a final step in which our own analytics are applied to the data. Those analytics involve analyzing other registration data associated with the resultant list of deceased registrants to determine whether any of the registrations contain voter credits dated past the date of death, whether any voter files contain registration dates past the date of death, and applying demographic groupings to the deceased registrants such as county of last residence, city, and age, among other things.

13. It is my belief and opinion that the process described above is the most accurate process available in the industry to flag individuals as deceased. On rare occasions, the Social Security Death Index contains an error and may inaccurately report a person as deceased. Accordingly, as a safeguard, we employ other tools to confirm a death such as locating the obituary and searching commercial databases to determine whether any financial or

commercial transactions are being conducted that are actively using a registrant's social security number.

14. In the case of someone using a deceased registrant's identity, our data will err on the side that the person is alive and not report them as deceased. This means that the data is more conservative and the incidence of deceased on the rolls may, in fact, be higher than we report. We also cull out and do not report as likely deceased any registrant whose record fails even one point of our tight matching process. This means that the Social Security Death Index may report a person as deceased but if there is any evidence of life activities elsewhere, then we do not report the registrant as deceased.

15. From a chain of custody and data security perspective, the voter registration data is protected in every step of the process, with voter data never transmitted in a non-secure manner.

16. The process described above is a conservative data process designed to ensure the highest level of accuracy.

I hereby declare, under penalty of perjury, that the foregoing is true, complete and accurate. I am aware that I am subject to punishment for supplying false information.

Executed on this __14__ day of October, 2020.

Kenneth J. Block
President, Simpatico Software Systems, Inc.

EXHIBIT A

Exhibit A to Block
Declaration

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Barrington, RI 02806
401-486-4152

kblock@simpaticosoftware.com

KENNETH J. BLOCK

PROFILE

Kenneth J. Block, The President of Simpatico Software Systems, Inc., has 32 years of experience working with large, mission critical systems. Ken has managed multiple, large concurrent lottery projects, and is an expert in the performance tuning and troubleshooting of complex systems. Ken was the chief architect for GTECH's Video Lottery product. Ken is a relational database expert and has been focused on helping state governments to achieve savings via waste and fraud analyses of their health and human services spending programs. Ken is a member of the Simpatico customer-facing team, responsible for contract management and operational coordination between Simpatico and state resources. Ken is credited with helping the State of Texas save more than a billion dollars in the State's Food Stamp program and has worked with elections data from the majority of states.

EXPERIENCE

PRESIDENT, DATABASE ARCHITECT AND CHIEF DATA SCIENTIST, SIMPATICO SOFTWARE SYSTEMS, INC., WARWICK, RI

2001-present

- Performed statewide pension analytics for every municipal and state retiree in the state of Rhode Island for WatchdogRI, 2019
- Ongoing – building and maintaining a fraud analytics system for lottery systems
- Conducted nationwide data analytics project on voter data 2017
- Liaison to State of Rhode Island executive branch resources for waste and fraud project, coordinating legal, administrative and technical issues for the project.
- Lead data mining engineer for Medicaid and Food Stamp waste and fraud project for the State of Rhode Island
- Liaison to State of Texas Health and Human Services department for EBT-related (Food Stamp) projects.
- Lead database engineer for Texas EBT
- Business development liaison to GTECH Corporation, EVERTEC, Northrop Grumman and other agencies/businesses.
- Database architect for Puerto Rico EBT system UNIX Migration.

PRESIDENT, CHIEF CONSULTANT, KINETIC CONSULTING, INC./TPS INC., BARRINGTON, RI

1995-2001

Founded software consulting firm providing system architecture, project management and relational database consulting services. Major projects:

- GM Group (San Juan, Puerto Rico): Led Kinetic team in development and deployment of an EBT system to Puerto Rico. Successful completion led to multi-year software support agreement.
- GTECH Corporation (West Greenwich, RI): Lead software support services engagement for the Rhode Island Video Lottery. Chief database architect.
- Transactive/Transaction Strategies Inc. (Dallas, TX): 'Turn around' project management for a company that created a hunter licensing system.

PRINCIPAL ARCHITECT, LEAD DESIGNER, PROJECT MANAGER, SENIOR DBA, TRANSACTIVE/GTECH CORPORATION, W. GREENWICH, RI/AUSTIN, TX

1994-1995

Significantly involved in all aspects of the Electronic Benefits Transfer (EBT) system for the State of Texas. Chief database architect for the product line. EBT is a debit card system for Food Stamp and AFDC benefit recipients.

DESIGNER, SENIOR DBA, GTECH CORPORATION, W. GREENWICH, RI

1991-1994

Major contributor and database architect to the Video Lottery product (VLS), a computerized network of Video Slot and Poker terminals all communicating with a central host across a WAN.

SENIOR ENGINEER, LOBB SYSTEMS, SAUGUS, MA

1990-1991

Performed consulting services to customers of this system integration company.

PROGRAMMER/SYSTEMS ANALYST, BANK OF NEW ENGLAND CORP, BOSTON, MA

1989-1990

Worked in Treasury group. Member of evaluation team tasked with re-architecting the bank's trading systems.

PROGRAMMER/SYSTEMS ANALYST, DALCOMP INCORPORATED, JERSEY CITY, NJ

1987-1989

Developed several financial packages relating to municipal and corporate bond underwriting for use by the investment banking community.

EDUCATION   **DARTMOUTH COLLEGE, HANOVER, NH**

B.A.: **Computer Science**, concentration in government, 1987